

1 KATHLEEN E. WELLS, State Bar No. 107051  
2 Attorney at Law  
3 3393 Maplethorpe Lane  
4 Soquel, California 95073  
5 Telephone: (831) 475-1243  
6 Email: lioness@got.net

7 Attorney for Plaintiff THOMAS PARRISH

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

THOMAS PARRISH,  Plaintiff,  v.  COUNTY OF SANTA CRUZ; OFFICER GHANOW; CALIFORNIA FORENSIC MEDICAL GROUP AND 20 UNKNOWN AGENTS/EMPLOYEES OF THE COUNTY OF SANTA CRUZ and THE CALIFORNIA FORENSIC MEDICAL GROUP,  Defendants.	Case No. 18-cv-04484-HSG  AMENDED STIPULATION AND [PROPOSED] ORDER TO AMEND SCHEDULING ORDER
---	--

Plaintiff THOMAS PARRISH (“Plaintiff”) and Defendants COUNTY OF SANTA CRUZ, OFFICER DAVID GANSCHOW (erroneously sued as “Officer Ghanow”) (“County Defendants”), and Defendant THE CALIFORNIA FORENSIC MEDICAL GROUP (“CFMG”) submit the following stipulation and proposed order continuing the dates in the scheduling order.

WHEREAS, on July 24, 2018, Plaintiff filed a complaint, on August 22, 2018, Plaintiff filed a first amended complaint, and on October 3, 2018, Plaintiff filed a second amended complaint (“SAC”).

WHEREAS, Defendant CFMG filed an answer to Plaintiff's SAC on October 10, 2018, Defendant County of Santa filed an answer to Plaintiff's SAC on October 22, 2018, and Defendant Ganschow filed an answer to Plaintiff's SAC on December 19, 2018.

WHEREAS, on October 31, 2018, County Defendants served Plaintiff with an initial set of discovery, and subsequently granted Plaintiff an extension to respond.

WHEREAS, in November and December 2018, Plaintiff's counsel, Kathleen Wells, experienced serious medical issues which impeded her ability to respond to the County Defendants' discovery or to litigate this matter;

WHEREAS, the settlement conference in this matter, formerly set for February 20, 2019, has been reset by order of Magistrate Beeler to June 4, 2019,

**Therefore**, Plaintiff, County Defendants, and Defendant CFMG stipulate and respectfully request as follows:

That the dates in the scheduling order be continued as follows:

<u>Event</u>	<u>Present Date</u>	<u>Requested Date</u>
Close of Fact Discovery	3/29/19	6/28/19
Exchange Opening Expert Reports	4/15/19	7/15/19
Exchange Rebuttal Expert Reports	4/29/19	7/29/19
Close of Expert Discovery	5/13/19	8/12/19
Disposition Motion Hearing	6/27/19	9/26/19
Pretrial Conference	9/24/19	11/26/19
Jury Trial (10 days)	10/7/19	12/09/19

IT IS SO STIPULATED.

Dated: March 1 , 2019

## Law Office of Kathleen E. Wells

By: \_\_\_\_\_ /s/  
KATHLEEN E. WELLS, Attorney for  
Plaintiff Thomas Parrish

1  
2 Dated: March 1 , 2019

The Law Offices of Jerome M. Varanini

3 By: \_\_\_\_\_/s/  
4 JEROME M. VARANINI  
5 Attorney for Defendant California Forensic  
6 Medical Group, Inc.

7  
8 Dated: March 1 , 2019

DANA McRAE, COUNTY COUNSEL

9 By: \_\_\_\_\_/s/  
10 RYAN THOMPSON  
11 Assistant County Counsel  
12 Attorneys for Defendants County of Santa  
13 Cruz and Officer David Ganschow  
14 [erroneously sued as "OFFICER  
15 GHANOW"]

## [PROPOSED] ORDER

Good cause appearing and based on the stipulation of counsel, the Court makes the following Order:

The dates in the scheduling order are continued as follows:

<u>Event</u>	<u>Date</u>
Close of Fact Discovery	6/28/19
Exchange Opening Expert Reports	7/15/19
Exchange Rebuttal Expert Reports	7/29/19
Close of Expert Discovery	8/12/19
Disposition Motion Hearing	9/26/19 at 2:00 p.m.
Pretrial Conference	11/26/19 at 3:00 p.m.
Jury Trial (10 days)	12/09/19 at 8:30 a.m.

## IT IS SO ORDERED.

DATED: 3/4/2019

Haywood S. Gill Jr.  
THE HONORABLE HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT COURT JUDGE